

STATEMENT OF BASIS (AI No. 3157)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0086304 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Sunbeam Products
Former Coushatta Plant (Remedial Operations)
2381 Executive Center Drive
Boca Raton, FL 33431

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Yvonne Baker

DATE PREPARED: November 21, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits - LA0086304
LPDES permit effective date: June 1, 2002
LPDES permit expiration date: May 31, 2007

D. Date Application Received: November 6, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - groundwater remediation

This is an existing facility that previously manufactured household steam irons, waffles irons, and assembled 2-cup water heaters. Manufacturing processes included molding and diecasting of aluminum and plastic appliance components, and a non-stick coating process. Sunbeam has ceased all manufacturing at the facility, but currently operates a groundwater remediation system.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I; BPJ'd to 5 points due to the type of wastewater being discharged.
3. Wastewater Type: II
4. SIC code: 9999

C. LOCATION - 2415 Red Oak Road in Coushatta, Red River Parish
Latitude 32° 00' 30", Longitude 93° 20' 11"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated recovered groundwater
Treatment: dual air column stripper
Location: at the point of discharge from at the north corner of the facility
Flow: 0.04 MGD
Discharge Route: via pipe into the Red River

4. RECEIVING WATERS

STREAM - via pipe into the Red River

BASIN AND SEGMENT - Red River Basin, Segment 100101

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply
f. agriculture

5. TMDL STATUS

Subsegment 100101, Red River - Arkansas State Line to Alexandria (Hwy. 165), is listed on LDEQ's Final 2004 303(d) List as impaired for sulfates and color. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Red River Basin, those suspected causes for impairment which are not directly attributed to the groundwater remediation point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

The discharge of treated recovered groundwater will not contribute to the sulfates and color impairments. Therefore, for the purpose of this permit, no impairments will be addressed.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit: None

7. COMPLIANCE HISTORY/COMMENTS

1. WQMD - An inspection on September 15, 2004 noted no areas of concern.
2. DMR Review/Excursions - A DMR review of years 2004, 2005, and 2006 noted no exceedances in permitted limits. 57 of 66 were on file at LDEQ.

8. EXISTING EFFLUENT LIMITS

Pollutant	Monthly Avg	Daily Max	Measurement Freq	Sample Type
Flow	---	Report	Bimonthly	Estimate
TOC	---	50 mg/l	Quarterly	24-hr composite
Trichlorethylene	---	69 ug/l	Quarterly	24-hr composite
Vinyl Chloride	---	172 ug/l	Quarterly	24-hr composite
Trans 1,2 Dichloroethene	---	66 ug/l	Quarterly	24-hr composite
pH	6.0 su	9.0 su	Bimonthly	grab

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 100101 of the Red River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the migratory waterfowl, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the migratory waterfowl. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.
Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Sunbeam Products

1. **Outfall 001** - treated recovered groundwater (estimated flow is 0.04 MGD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow (MGD)	---:Report	
TOC	---:50 mg/l	Previous Permit *BPJ
Trichloroethylene	---:69 µg/l	Previous Permit **BPJ
Vinyl Chloride	---:172 µg/l	Previous Permit **BPJ
Trans 1,2 Dichloroethene	---:66 µg/l	Previous Permit **BPJ
pH	6.0 - 9.0 su	Previous Permit *BPJ

Treatment: dual air column stripper

Monitoring Frequency: Twice per month for flow and pH, and quarterly for all other parameters at the point of discharge from the treatment plant, located at the north corner of the facility. Monitoring frequency is based on BPJ due to the facility's good compliance record.

Limits Justification: * TOC and pH limitations are based on permitting guidance for similar discharges. ** Trichloroethylene, Vinyl Chloride, and Trans 1,2 Dichloroethene limitations are based on the Organic Chemicals, Plastics, and Synthetic Fibers (OCPSF) Guidelines at 40 CFR 414 Subpart J.

NOTE: A Water Quality Screen was performed. The screen indicates that no water quality based limits are needed.

MGD Million Gallons per Day
BPJ Best Professional Judgment
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 9999 is not considered to be associated with industrial activities. Therefore, an SWP3 is not included in the permit.